

REMARKS

Claims 1-7 are pending. Claims 1-7 have been amended to overcome the 35 USC 112, second paragraph rejection, but not to overcome the prior art. No new matter is presented.

Claims 1-7 stand rejected under 35 USC 112, second paragraph, as being indefinite. Claims 1-7 have been amended to clarify the invention and to clearly set forth that which the Applicants consider their invention. Applicants request that this rejection be withdrawn.

Claims 1-7 stand rejected under 35 USC 103(a) as being unpatentable over Kari (U.S. Patent No. 6,636,491) in view of Bouret (U.S. Application 2002/0101879). This rejection is respectfully traversed.

The Examiner asserts that Kari teaches all of the features of claim 1, except for the feature of verifying . . . based on a request sent to it from the external site relating to a network-internal function. The Examiner asserts that Bouret teaches that services are being provided by an external service provider by signaling from the external service provider to an interface entity. The Examiner then asserts that it would have been obvious to have modified Kari in view of Bouret "to provide data communication services for users."

Kari a system with a GSM and a GPRS network wherein a mobile user wants to use a Internet access point to use some third-party service. Kari teaches, at col. 4, lines 17-21, that the GSM network only provides a physical connection between the mobile station and the support node. The GSM network contains a HLR, wherein subscriber data and routing information is stored. To access GPRS services, a PDP (Packet Data Protocol) activation procedure is run, and the MS is attached to the network (col 5, lines 6-8, 16-17 and 45-46). With further PDP context information, different data transmission parameters can be transmitted. Kari also discloses that anonymous access to the network is possible (see col. 6, lines 3-4).

Bouret is directed to how services can be provided for clients by external service providers. The service provider offers a service at an interface and the entity makes a decision

regarding acceptance of the offer. The paragraph cited by the Examiner merely teaches that services may be provided by at least one external service provider, but fails to teach how this takes place, and most certainly fails to specifically teach or suggest "verifying, on the part of the secure service interface device, based on a request sent to it from the external site relating to a network-internal function, whether the request involves use of a function of second network." The cited paragraph only states that "offers are processed at the interface entity in order to make a decision regarding the acceptance of the offer." Bouret does not teach, however, how and on what facts and grounds that decision is made. Thus, Bouret fails to teach or suggest that for which it is relied.

Further, even assuming *arguendo* that Bouret teaches that which the Examiner asserts, Applicants submit that one of ordinary skill in the art would not have been motivated to modify Kari in view of Bouret to "provide data communication services for users" because Kari is already directed to obtaining such results, as evidence in the Background of the Invention at col. 1, lines 16-34). The burden is on the Examiner to provide evidence of why one of ordinary skill in the art would have been motivated to change the way this goal is already achieved by the invention of Kari to employ the process disclosed in Bouret. Merely providing communication services for users is already achieved by Kari. The Examiner must point to something more specific which relates to the desirability of using the process which Bouret teaches which is not already taught by Kari. The alleged motivation for combining these references is so broad as to hold no relevant meaning with respect to the feature which the Examiner admits is not taught by Kari but which the Examiner believes is taught by Bouret and which the Examiner also believes would have been obvious to employ in the system of Kari. The Examiner has failed to do so and thus has failed to set forth a *prima facie* case of obviousness.

Accordingly, Applicants request that this rejection be withdrawn.


In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is

determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **449122079100**.

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Respectfully submitted,

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